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Change Number M-13-94-01	Federal Facility Agreement and Consent Order Change Control Form Do not use blue ink. Type or print using black ink.	Date Jan. 25, 1994
Originator Julie Erickson		Phone 376-3603
Class of Change <input type="checkbox"/> I - Signatories <input checked="" type="checkbox"/> II - Project Manager <input type="checkbox"/> III - Unit Manager		
Change Title Consolidation of 300 Area Operable Units 300-FF-2, 300-FF-3, 300-FF-4, and 300-IU-1		
Description/Justification of Change Consolidate all remaining 300 Area waste sites into a single CERCLA operable unit (OU). The waste sites from 300-FF-3, 300-FF-4, and 300-IU-1 will be grouped into 300-FF-2. The Limited Field Investigation Workplan for the expanded 300-FF-2 will be submitted to the Regulators in November 1994.  The remedial decisions for the 300-FF-2, 300-FF-3, 300-FF-4, and 300-IU-1 will be significantly accelerated by this change. 300-FF-2 and 300-FF-3 are both close to the Columbia River and City of Richland.  See attached.		
Impact of Change Consolidating the OUs will make a single, more complex OU but it will allow the remainder of the 300 Area NPL site to be addressed with a single record of decision.  The consolidation of these four OUs into one will constitute the equivalent of one workplan milestone (M-13-00) in Calendar Year (CY) 1994 and two in CY 1995.		
Affected Documents Hanford Federal Facility Agreement and Consent Order (Tri-Party Agreement), Appendix C; Hanford Site Waste Management Units Report: WIDS, Appendix D; Work Schedules.		
Approvals <input checked="" type="checkbox"/> Approved <input type="checkbox"/> Disapproved  This change form approved by Amendment Four to the Hanford Federal Facility Agreement and Consent Order executed by the signatories on January 25, 1994.  John Waggoner _____ January 25, 1994 DOE Date  Gerald Emison _____ January 25, 1994 EPA Date  Mary Riveland _____ January 25, 1994 Ecology Date		

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CONSOLIDATION OF 300 AREA OPERABLE UNITS  
300-FF-2, 300-FF-3, 300-FF-4, AND 300-IU-1

Action: Consolidate the remaining 300 and 400 Area Operable Units (OU) (300-FF-2, 300-FF-3, 300-FF-4, and 300-IU-1) into one OU, designated 300-FF-2 and prepare a workplan. Consolidating these OU's and initiating a workplan in calendar year 1994 will significantly accelerate the 300 Area NPL Site in its entirety.

Background: The 300-FF-2 OU is the area generally north of the facilities in the 300 Area and consists of burial grounds. Within the boundaries of the 300-FF-3 OU are most of the facilities, buildings, and staff that work in the 300 Area and storage tanks, tanks, drain fields, a burial ground, and numerous spills. The 300-FF-4 OU is located around the FFTF, a considerable distance from the 300 Area Proper with waste management units (WMU) that consist of french drains, sanitary sewer, tile fields and a pond. Finally the 300-IU-1 OU is located northwest of the 300 Area Proper and contains burial grounds, a crib and a spill.

Scope/Discussion: There are many operational facilities in the 300-FF-3 OU which house a large work force. Many of the spills are under or close to facility foundations, road ways, and around underground utilities. This complicates the ability to safely and appropriately characterize and remediate the OU while these facilities are occupied and remain in place. The 300-FF-3 characterization/remediation work scope aspects of the new workplan will reflect a schedule based on when 300 Area operational facilities are no longer staffed and utilized. Current data would suggest that there are not any immediate threats to human health or the environment from WMUs in 300-FF-3. Until such time that 300-FF-3 WMUs are addressed, 300-FF-5 groundwater monitoring activities and routine radiological surveys will be performed to verify that no changes have occurred within the 300-FF-3 OU. WMUs in 300-FF-2, 300-FF-4, and 300-IU-1 could be addressed sooner as agreed to by the parties.

The Hanford Past Practice Strategy will be utilized to the highest degree possible such that analogous waste site and observational approach concepts are factored into the workplan and that remediation work will be focused on high priority sites based on qualitative risk assessments.

Schedule:

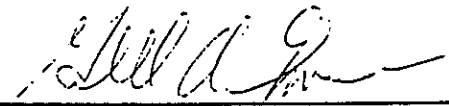
M-13-08

- Issue Limited Field Investigation workplan for the 300-FF-2 expanded Operable Unit for regulator review. Due Date: November 1994

IT IS SO AGREED:

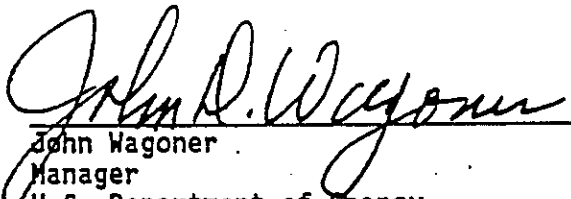
Each undersigned representative of a Party certifies that he or she is fully authorized to enter into this Agreement and Action Plan and to legally bind such Party to this Agreement and Action Plan. These change requests and amendments shall be effective upon the date on which this amendment agreement is signed by the Parties. Except as amended herein, the existing provisions of the Agreement shall remain in full force and effect.

FOR THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY:

  
\_\_\_\_\_  
Gerald Emison  
Acting Regional Administrator  
Region 10  
U.S. Environmental Protection Agency


1-25-74  
Date

FOR THE UNITED STATES DEPARTMENT OF ENERGY:

  
\_\_\_\_\_  
John Wagoner  
Manager  
U.S. Department of Energy  
Richland Operations Office

1/25/94  
Date

FOR THE WASHINGTON STATE DEPARTMENT OF ECOLOGY:

  
\_\_\_\_\_  
Mary RiveLand  
Director  
State of Washington  
Department of Ecology

1/25/94  
Date

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